

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

AVR GROUP, LLC; TRIDENT ASSET  
MANAGEMENT, INC.; and MICHAEL  
DZIURGOT, individually and on behalf of a  
putative class,

*Plaintiffs,*

vs.

ALEBRIJE ENTERTAINMENT, LLC;  
CRAIG COLE; MATTHEW COLE;  
GUSTAVO MONTAUDON; and JOHN  
DOE NOS. 1–10,

*Defendants.*

Case No. 1:24-cv-20755

**DEFENDANT CRAIG COLE’S REQUEST  
FOR JUDICIAL NOTICE**

Defendant Craig Cole hereby requests that the Court, pursuant to Federal Rule of Evidence 201, take judicial notice of the publicly filed documents attached hereto as Exhibits 1–3. This request is made in support of the Defendant Craig Cole’s Motion to Dismiss, filed contemporaneously herewith.

**Exhibit 1:** Attached as Exhibit “1” is a true and correct copy of the Order on Appointment of a Permanent Receiver in the U.S. District Court, Central District of California, Case No.: 21-cv-02927, Securities and Exchange Commission v. Zachary J. Horwitz; and 1inMM Capital, LLC. Federal Rule of Evidence 201 permits Judicial Notice of this Order.

**Exhibit 2:** Attached as Exhibit “2” is a true and correct copy of the Second Amended Complaint in the U.S. District Court, Northern District of California, Case No.: 23-cv-00287-VC, AVR Group

v. SAC Advisory Group, LLC. Federal Rule of Evidence 201 and the doctrine of incorporation-by-reference permit Judicial Notice of this Complaint.

**Exhibit 3:** Attached as Exhibit “3” is a true and correct copy of the Second Amended Complaint in the U.S. District Court, Northern District of Illinois, Case No.: 21-cv-01867, Aronson v. JJMT Capital, LLC. Federal Rule of Evidence 201 and the doctrine of incorporation-by-reference permit Judicial Notice of this Complaint.

Dated: May 06, 2024

Respectfully submitted,

**STUMPHAUZER KOLAYA NADLER  
& SLOMAN, PLLC**

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By: /s/ Francis D. Murray

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6<sup>th</sup> day of May, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, causing a copy of the foregoing document to be served on all counsel of record via Notice of Electronic Filing.

/s/ Francis D. Murray

FRANCIS D. MURRAY